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December 20, 2023

Via ECF
Hon. Victor Marrero
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

USDC SDNY
DOCUMENT
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**Re: United States v. Maravavier Hurts
Crim. No. 23-394 (VM)**

Dear Judge Marrero:

I represent Maravavier Hurts in his federal criminal matter pursuant to the Criminal Justice Act (“CJA”). Mr. Hurts’ bail conditions currently include him being on curfew with location monitoring. Mr. Hurts is respectfully requesting a modification of his bail so that he can travel to visit his family in Jacksonville, Florida for the Holidays from December 19, 2023 until January 3, 2024. Mr. Hurts would be driving to Jacksonville and traveling with his mother, Annie G. Johnson, who is a co-signor on his bond. She will remain with him the entire time. They will be staying with Mr. Hurts’ sister and her family, which includes the following family members: his sister, sister’s husband, their baby and 2 kids. We are requesting the following bail modifications:

1. Request to modify his bail conditions to include the Middle District of FL as an approved location for temporary travel from December 19, 2023, until January 3, 2024;
2. Request to modify his curfew to a stand-alone GPS Monitor

Probation Officer (“PO”) DeAndre Meadows from Alabama indicated that this would allow him to continue to monitor him. Mr. Hurts would have no residential curfew, home detention, or home incarceration restrictions, Mr. Hurts would be required to comply, and would comply, with the location or travel restrictions as imposed by the Court.

PO DeAndre Meadows, who is supervising Mr. Hurts in Alabama as a courtesy to Pretrial Services in the Southern District of New York, has provided a compliance update to PTSO Evelyn Alvayero, who is his assigned Pretrial Services Officer in Southern District of

New York. He reported that Mr. Hurts has been perfectly compliant. Evelyn Alvayero has no objection to this and AUSA Nicholas Chiuchiolo on behalf of the Government has no objection to the proposal previously mentioned, on the condition that the request to modify his bail conditions to include the Middle District of FL as an approved location for temporary travel from December 19, 2023, until January 3, 2024 is temporary to facilitate Mr. Hurts trip to Florida for the holidays.

Should Your Honor grant this request, Mr. Hurts will arrange his travel and time to leave and return to his home with PTSO Evelyn Alvayero. Moreover, he will abide by any additional conditions imposed by Pretrial Services while the modification is active. Your Honor's time and consideration of this request is greatly appreciated.

Respectfully submitted,



Lorraine Gauli-Rufo, Esq.
Attorney for Maravavier Hurts

Cc: Nicholas Chiuchiolo, AUSA
Evelyn Alvayero, PTSO
DeAndre Meadows, PO

Request GRANTED.

Defendant's bail conditions are hereby modified to include the Middle District of Florida as an approved location for temporary travel, and Defendant's curfew is hereby modified to a stand-alone GPS Monitor. These modifications are temporary and will only remain in effect from December 19, 2023, until January 3, 2024. Defendant is directed to arrange his travel and will return to his home with Pretrial Services Officer Evelyn Alvayero, and Defendant will abide by any additional conditions imposed by Pretrial Services while these modifications are active.

SO ORDERED.

20 December 2023

DATE



20 DECEMBER 2023
VICTOR MARRERO, U.S.D.J.